

I, Sara K. Pedersen being duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant of VINCENT STEPHEN ARMSTRONG (hereafter ARMSTRONG), date of birth December 11, 19xx, residence on Willow Run Drive, Toledo, Ohio 43607, for violations of Title 18, United States Code, Section 1001(a)(2).

2. Your Affiant is a Special Agent of the Federal Bureau of Investigation (FBI), and, as such, is an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. Your Affiant is engaged in the enforcement of criminal laws and is within a category of officers authorized by the Attorney General to request and execute search warrants pursuant to Title 18 U.S.C. §3052 and 3107; and DOJ regulations set forth at Title 28 C.F.R. § 0.85 and 60.2(a).

3. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), United States Department of Justice and have been since June of 2014. I am currently assigned to the Cleveland Division in the Toledo Resident Agency. My educational background includes study in the field of criminal justice, psychology, and the law. Prior to becoming a Special Agent, I worked as a criminal defense attorney for approximately six years at the state court level.

4. My experience as an FBI agent includes the investigation of national-security cases involving individuals seeking to travel overseas to commit violent jihad, those who have participated in terrorist fundraising, those who desired to commit domestic acts of terrorism, and those who have sought to commit acts of violence in the United States. Additionally, I have completed FBI administered counterterrorism classroom and online training, at the FBI Academy, and at other FBI facilities.

5. My experience as an FBI agent also includes the investigation of a criminal cases, including a major criminal enterprise where 28 people were indicted for multiple crimes including RICO Conspiracy. I have also assisted in investigations regarding healthcare fraud, child pornography, murder, kidnapping, and drug cases.

6. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

7. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to establish that ARMSTRONG has committed violations of Title 18, United States Code, Section 1001(a)(2).

II. BACKGROUND AND PROBABLE CAUSE

8. Title 18, United States Code, Section 1001(a), prohibits a person from “knowingly and willfully (1) falsif[ing], conceal[ing], or covering up by any trick, scheme, or device a material fact; (2) making any materially false, fictitious, or fraudulent statement or representation. . . .”

9. On or about June 11, 2018, Toledo Police received information regarding ARMSTRONG. The information revealed ARMSTRONG had recently expressed a desire to conduct a violent attack and was in possession of multiple firearms and the beginning elements of a pipe bomb. The case was referred to your Affiant with the Joint Terrorism Task Force (“JTTF”) with the FBI.

10. On or about June 11, 2018, your Affiant conducted an investigation regarding the original complaint. The complainant told law enforcement that ARMSTRONG underwent

noticeable behavioral changes that began to occur when ARMSTRONG started dating, and living with, Elizabeth Lecron at a residence on Willow Run Drive, Toledo, Ohio 43607. Specifically, ARMSTRONG started wearing exclusively black shirts and camouflage pants. ARMSTRONG and Lecron also started going to the shooting range located in Oregon, Ohio, and talking about anarchistic ideas. The complainant stated ARMSTRONG and Lecron used the social media platform, Tumblr. Lecron used Tumblr under the profile “ligaturemarkings” and ARMSTRONG used “societysheretic.” ARMSTRONG and Lecron often posted items about mass murder.

A. ARMSTRONG’S TUMBLR PROFILE

11. ARMSTRONG using the profile “societysheretic,” posted three photographs next to one another in an undated post. The photograph on the left shows Armstrong in camouflage pants and a black t-shirt smoking. The center photograph is Armstrong loading ammunition into an ammunition chest carrier. The photograph on the right shows Armstrong holding a long gun, ammunition draped across his chest, standing in what appears to be in a residence on Willow Run Drive, Toledo, Ohio 43607. Lecron re-posted these photographs using the profile “ligaturemarkings” with the comment, “this is my close friend Vinny, he likes to dress like this in the first picture. He’s a true crime boy! The shotgun is mine. Eric Harris who?” Your Affiant believes the reference to Eric Harris is a reference to one of the Columbine High School shooters.

B. TUMBLR PROFILE: “LIGATUREMARKINGS”

12. The Affiant confirmed with Tumblr that profile “ligaturemarkings” is registered to beelecron95@gmail.com. Your Affiant is aware that Elizabeth Lecron goes by the nickname “Bee.” Additionally, photographs of Lecron appear on “ligaturemarkings” profile providing

additional evidence that Lecron is the user of that profile. Through the “ligature markings” Tumblr account, Lecron posted voluminous photographs and comments glorifying mass murders like the Columbine shooters¹ and Dylann Roof.

13. On July 4, 2018, Lecron posted a photograph of Dylann Roof saluting with the words, “YOU DON’T KNOW WHAT REAL HATRED IS.” An image of a knife and gun are next to Roof.

14. On July 28, 2018, Lecron posted a photograph of Pope Francis purportedly holding the Eucharist or Bible. However, instead of holding the Eucharist or Bible, Dylann Roof’s face is superimposed as to give the impression Pope Francis is honoring Roof.

15. In an undated post, Lecron displayed a photograph of Dylann Roof with his hand in a gun shape.

16. In another undated post, Lecron posted two photographs next to one another. The photograph on the left is surveillance video from the Columbine High School shooting showing the shooters in the cafeteria. The photograph on the right is three preteen or young teenage girls each looking at their cell phones. Across the top of both photographs states, “SO GLAD I GREW UP.” The words “DOING THIS” appear below the photograph of the Columbine shooting surveillance video, and the words “NOT THIS” below the three girls looking at their cell phones.

17. Similarly, in an undated post, Lecron posted a grainy photograph of the two Columbine shooters with the word “GODLIKE” scrolled across them.

¹ Your Affiant is aware that Dylan Klebold and Eric Harris committed a mass shooting at Columbine High School on April 20, 1999, killing thirteen people and wounding twenty one. In addition to using firearms, Klebold and Harris planted numerous homemade bombs or explosive devices inside and outside of the high school.

18. On August 10, 2018, another Tumblr user posted, “Can’t we all just get along and love Eric Harris?” A different Tumblr user replied, “i organize eric cryparties every weekend if anyone’s interested.” Lecron replied, “I’ll bring the Chex mix.”

19. Lecron then posted she was going to fly to Columbine in what appears to be an effort to honor the shooters. Specifically, Lecron posted, “Littleton trip. I’m buying plane tickets to Littleton with [ARMSTRONG] We’re gonna try to hit Rampart Range, the memorial, the gas station, the bowling alley and such. It’s gonna be a lot of fun and i can’t wait to post pictures!” Your Affiant knows that all the places listed are places of importance to the Columbine shooters.

20. In an undated post, another Tumblr user stated to Lecron, “U are trying to kill!!! U are scary admit urself into a ward u and ur bf are the next mass shooters if someone doesn’t stop u!!!!” Lecron responded, “Damn, they caught us . . . @societysheretic.”

B. TUMBLR PROFILE: “CHARLESTONCHURCHMIRACLE”

21. A few months ago, the exact date being unknown, Tumblr shut down Lecron’s “ligaturemarkings” profile for violating Tumblr’s terms of use for posting offensive content. Sometime thereafter, Lecron created a new Tumblr profile, “CharlestonChurchMiracle.” Your Affiant believes this username is a tribute to Dylann Roof. Lecron continued to post photographs or comments about various mass murders under this new profile.

22. Specifically, Lecron reposted a photograph of Vladislav Roslyakov walking into Kerch Polytechnic College carrying a duffle bag. Below the photograph it stated, “Vladislav Roslyakov walking into Kerch Polytechnic College, at about 11:46 a.m. with pipe bombs and around 150 rounds of ammunition, with the t-shirt ‘*HATRED*.’” Your Affiant knows that on

October 17, 2018, Roslyakov killed approximately twenty people and wounded seventy others through bombs and gunfire at Kerch Polytechnic College in Kerch, Crimea.

23. Similarly, Lecron reposted a photograph of what appears to be human remains on a table. Below the photograph it stated, “Human flesh and bones found inside the home of the cannibal serial killer, **Karl Denke**.” Your Affiant knows that Karl Denke was a Prussian serial killer and cannibal in the early 1900s.

24. Furthermore, Lecron reposted a photograph of what appears to be a lifeless female victim laying in a bathtub from an unknown murder. There is blood covering the bathtub and surrounding walls and floor, with the female’s dismembered arm laying on the floor. A male is standing over her with a knife in his right hand and blood covering his right arm.

25. Lecron reposted a photograph of a mirror with the words, “Born to Kill” etched into the mirror.

D. COLORADO TRIP

26. On August 17, 2018, Lecron and ARMSTRONG flew from Detroit to Denver to visit the sights related to the shooting at Columbine High School.

27. On August 20, 2018, a Jeffco Schools Security & Emergency Management Patrol Officer stated that he stopped and questioned Lecron for acting suspicious and stepping onto Columbine High School property. Lecron stated she came to look at the memorial. The Officer observed Lecron take pictures and asked that she delete them. Lecron gave her identifying information to the Officer.

28. On or about August 20, 2018, Lecron posted on Tumblr under her profile, “ligature markings,” a photograph of ARMSTRONG at the Columbine Memorial, along with several photographs of Columbine High School and the Columbine Memorial. Lecron even

detailed her contact with a Jeffco Officer while at Columbine High School. Lecron posted her next trip would be to Charleston to visit “the church.” Your Affiant believes Lecron is referring to visiting the church in Charleston, South Carolina where Dylann Roof committed his mass shooting.

E. FIRST SEARCH OF TARGET RESIDENCE

29. On August 18, 2018, United States Magistrate Judge James Knepp II authorized a search warrant, and delayed notification, for a residence on Willow Run Drive, Toledo, Ohio 43607. The warrant authorized a search of the residence and a “physical search of the premise includes surreptitiously entering the Target Residence, including opening locked areas, containers, safes, or other facilities, and inspecting, reproducing, altering, or seizing any electronic storage media (including computer hard drives and removable storage media), software, documents and other tangible objects of any kind found within the premises or on the property.”

30. On August 19, 2018, law enforcement searched the residence. Inside the residence, they found an AK-47, a shotgun, multiple handguns, and a large quantity of ammunition. Additionally, law enforcement found a plastic shopping bag containing numerous end caps, which can be used in the manufacturing of pipe bombs, and were purchased by ARMSTRONG.

31. Furthermore, law enforcement found journal entries by Lecron and ARMSTRONG discussing a violent attack. Excerpts from the journals are set forth below in Sections F and G.

F. ARMSTRONG'S JOURNAL ENTRIES

32. In a journal entry dated May 18, 2018, ARMSTRONG wrote, "Today is a good day. I heard some shit went down in Texas. Hmm. . ." Your Affiant believes ARMSTRONG was referring to a school shooting at Santa Fe (Texas) High School on May 18, 2018 where a student smuggled a revolver and shotgun into the high school campus and shot and killed ten people and wounded thirteen others.

33. In a journal entry dated June 8, 2018, ARMSTRONG wrote, "I have also bought caps from the local hardware store for bombs- pipe bombs to be exact. Soon we will bring destruction on society. F- -K THEM!! THEY ARE WORTHLESS UNGODLIKE SCUM WHO WANT TO LIVE BY 'THEIR' RULES AND CONSTRUCTS!" During the August 19, 2018 search of the Target Residence, law enforcement observed end caps and a receipt for a drill. Your Affiant knows through training and experience end caps are used to construct pipe bombs. Furthermore, your Affiant knows it is common to drill small holes in the end caps to allow space for a wick or fuse to ignite the explosive material inside the pipe.

34. In a journal entry dated June 8, 2018, ARMSTRONG wrote, "Haven't wrote in awhile. . . not much to say or feel. Now I have these thoughts . . . These memories. They haunt me. I have a vision. A vision to kill. To hunt the unwilling. These peasants to society. The hatred towards the human race is bewildering. It makes me feel so good to know I will end it all. Very soon. I am buying a knife this weekend to slay my pray. To shake things up in this world. Get away from society but also get away with it. Nobody will know."

G. LECRON'S JOURNAL ENTRIES

35. In a journal entry dated May 10, 2018, Lecron wrote, "Vinny [ARSTRONG] was left at the bar tonight. I got 4 concerning texts. Our friends don't give a f- -k whatever, neither do we. He'll have his revenge, and so will I."

36. In a journal entry dated May 23, 2018, Lecron wrote, "Around 5am, I called Vinny [ARMSTRONG]. He told me he felt homicidal. He had followed a car, wanting to murder. Didn't happen but it worried me. I just told him 'soon.'"

37. In a journal entry dated June 8, 2018, Lecron wrote, "Vinny [ARMSTRONG] and I got into a fight last night. Not really a fight fight, but I caught him being dishonest. Im really hurt. Truly. Why does this happen to me??? I still love him immensely and D-day is on track."

H. SECOND SEARCH OF THE TARGET RESIDENCE

38. On December 10, 2018, law enforcement executed search warrants at a residence on Willow Run Drive, Toledo, Ohio 43607, and ARMSTRONG's and Lecron's vehicles. In the trunk of ARMSTRONG's vehicle was a duffel bag containing a tactical vest with two loaded magazines for an AK-47, two loaded magazines for a pistol; a white t-shirt with black letter, "Society failed us," a black trench coat, gas mask, printout from the website Jolly Rogers with instruction of how to construct various bombs and instruction to pick a lock.

39. In the residence, law enforcement seized an AK-47, shotgun, and a handgun. The AK-47 had the butt stock removed. (In my training and experience, I know that many mass shooters remove the butt stock to shorten the firearm making it easier to conceal under something like a trench coat.) Additionally, law enforcement found a lock picking set inside the residence.

I. INTERVIEW OF ARMSTRONG

40. Before the search of the target residence was conducted on December 10, 2018, law enforcement conducted a non-custodial interview of ARMSTRONG. At the beginning of the interview, ARMSTRONG was not in handcuffs, told he was not under arrest and was free to leave. The door to the room was open. Throughout the interview, agents took breaks and offered food and provided water to ARMSTRONG. About one hour into the interview, agents reminded ARMSTRONG that he was not under arrest and was free to leave.

41. Before asking a question, the agents gave him what is commonly referred to as 1001 warnings. Specifically, Agent 1 read verbatim United States Code, Title 18, Section 1001 and commented as follows: "United States Code, Title 18, Section 1001 provides in part as follows; Whoever, in any matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully –falsifies, conceals, or covers up by any trick, scheme, or device a material fact, makes any materially false, fictitious, or fraudulent statement or representation, or makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title or imprisoned not more than 5 years, or both. Um, do you under, I realize that this is probably the first time you have ever had any form like that read to you." ARMSTRONG indicated that he understood by responding "Yeah," and communicated his understanding through his body language.

42. The agents asked a series of questions in which ARMSTRONG initially provided false or misleading information. Specifically, the agents asked ARMSTRONG, "Has Elizabeth ever discussed with you any plans to commit an attack that would involve the loss of life, bodily injury, or property damage?" ARMSTRONG replied, "Um, besides like a in a role-playing

aspect, no.” A short time later, agents asked again, “Have you and Elizabeth ever discussed a plan or strategy on how or where to commit an attack involving the loss of life, bodily injury, or property damage? ARMSTRONG replied, “No, not, not anywhere real on I don’t think anywhere fictional.”

43. Similarly, early in the interview agents asked ARMSTRONG, “Have you or did Elizabeth ever purchase pipes, caps, black powder, fuses, screws, or other bomb components for the purpose of making a bomb?” ARMSTRONG replied, “No, ah I don’t know about her because I didn’t know ...(unintelligible) ... ah but for me no.” Agents asked again whether he had purchased bomb parts and ARMSTRONG reaffirmed he had not.

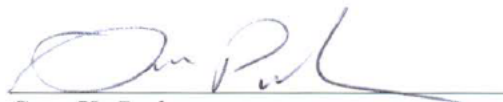
44. More than two hours later, agents informed ARMSTRONG that they searched his residence in August. After that point, ARMSTRONG changed his answers to similar questions. For example, ARMSTRONG then admitted that he and Lecron discussed an attack on an identified second floor bar and that it “crossed over” from fantasy to reality sometime in June of this year.

45. ARMSTRONG later said he did buy parts for a bomb, “Umm...I remember buying them [end caps] at some point...that was in May...I think, I believe it was in May...and that was...it was...very heavy into it.” Agent responded, “Ok. So with your discussions with Elizabeth about conducting an attack...you guys discussed pipe bombs...you don’t remember the exact extent...but then after those discussions, at some point or while they were occurring, you did go out and get the endcaps then...in kind of like a preparation.” ARMSTRONG replied, “Yes [clears throat afterwards, coughing].” ARMSTRONG also admitted he went to a website, JollyRogers.com, and printed out instructions to make bombs.

CONCLUSION

46. Based on the foregoing facts and circumstances, there is probable cause to believe that VINCENT STEPHEN ARMSTRONG has committed a violation of Title 18, United States Code, Section 1001(a)(2), that is Providing False Statements to a Federal Law Enforcement Officer. As such, your Affiant requests that a warrant for his arrest issues.

Respectfully submitted,



Sara K. Pedersen
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me telephonically
after being submitted by reliable electronic means
on December 12, 2018



Honorable James R. Knepp
UNITED STATES MAGISTRATE JUDGE